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*Attorneys for Plan Administrator
on Behalf of the Wind Down Estates*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
	:
DITECH HOLDING CORPORATION, <i>et al.</i>,	:
	:
Debtors.¹	:
	:
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Chapter 11
Case No. 19-10412 (JLG)
(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
TELEPHONIC HEARING ON FEBRUARY 29, 2024 AT 11:00 A.M.**

¹ On September 26, 2019, the Court entered the *Order Confirming Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors* (ECF No. 1404) (the “**Confirmation Order**”), which created the Wind Down Estates. On February 22, 2022, the Court entered the *Order Granting Entry of Final Decree (I) Closing Subsidiary Cases; and (II) Granting Related Relief* (ECF No. 3903) (the “**Closing Order**”). Pursuant to the Closing Order, the chapter 11 cases of the following Wind Down Estates were closed effective as of February 22, 2022: DF Insurance Agency LLC (6918); Ditech Financial LLC (5868); Green Tree Credit LLC (5864); Green Tree Credit Solutions LLC (1565); Green Tree Insurance Agency of Nevada, Inc. (7331); Green Tree Investment Holdings III LLC (1008); Green Tree Servicing Corp. (3552); Marix Servicing LLC (6101); Mortgage Asset Systems, LLC (8148); REO Management Solutions, LLC (7787); Reverse Mortgage Solutions, Inc. (2274); Walter Management Holding Company LLC (9818); and Walter Reverse Acquisition LLC (8837). Pursuant to the Closing Order, the chapter 11 case of Ditech Holding Corporation (the “**Remaining Wind Down Estate**”) (Case No. 19-10412 (JLG)) shall remain open and, as of February 22, 2022, all motions, notices and other pleadings relating to any of the Wind Down Estates shall be filed in the case of the Remaining Wind Down Estate. The last four digits of the Remaining Wind Down Estate’s federal tax identification number is (0486). The Remaining Wind Down Estate’s principal offices are located at 2600 South Shore Blvd., Suite 300, League City, TX 77573.

I. STATUS CONFERENCE:

1. Case Conference

II. UNCONTESTED MATTER:

2. Consumer Claims Trustee's Motion to Amend Claim Hearing Procedures (**ECF No. 4987**)

Response Deadline: February 22, 2023 at 4:00 p.m.

Responses Filed: None.

Related Document:

- A. Notice of Hearing on Consumer Claims Trustee's Motion to Amend Claim Hearing Procedures (**ECF No. 4986**)

Status: This matter is going forward on an uncontested basis.

III. CONTESTED MATTERS:

3. Consumer Claims Trustee's Forty-Sixth Omnibus Objection to Proofs of Claim (Insufficient Legal Basis Unsecured Consumer Creditor Claims) (**ECF No. 3461**)

Response Deadline: July 16, 2021 at 4:00 p.m.

Response Filed:

- A. Response and Objection of James Turner to Consumer Claims Trustee's Forty-Sixth Omnibus Objection to Proofs of Claim (Insufficient Legal Basis Unsecured Consumer Creditor Claims) (**ECF No. 3561**)

Related Documents:

- B. Order Granting Consumer Claims Trustee's Twenty-Seventh Omnibus Objection to Proofs of Claim (Duplicate or Amended Unsecured Consumer Creditor Claims) (**ECF No. 2808**)
- C. Notice of Adjournment of Hearing on Consumer Claims Trustee's Forty-Sixth Omnibus Objection to Proofs of Claim (Insufficient Legal Basis Unsecured Consumer Creditor Claims) (**ECF No. 3544**)
- D. Reply of Consumer Claims Trustee in Support of the Consumer Claims Trustee's Forty-Sixth Omnibus Objection to Proofs of Claim (Insufficient Legal Basis Unsecured Consumer Creditor Claims) with Respect to the Claim of James Turner (Claim No. 1012) (**ECF No. 4970**)

- E. Notice of Hearing of Consumer Claims Trustee in Support of the Consumer Claims Trustee's Forty-Sixth Omnibus Objection to Proofs of Claim (Insufficient Legal Basis Unsecured Consumer Creditor Claims) Solely as to Claim No. 1012 **(ECF No. 4971)**
- F. Minutes of Proceedings **(ECF No. 4988)**
- G. Sur-Reply of James Turner to the Reply of the Consumer Claims Trustee in Support of the Consumer Claims Trustee's Forty-Sixth Omnibus Objection with Respect to the Claim of James Turner (Claim No. 1012) **(ECF No. 4992)**
- H. Response of the Consumer Claims Trustee to the Sur-Reply of James Turner to the Reply of Consumer Claims Trustee in Support of the Consumer Claims Trustee's Forty-Sixth Omnibus Objection with Respect to the Claim of James Turner (Claim No. 1012) **(ECF No. 4998)**

Status: This matter is going forward on a contested basis solely with respect to the claim of James Turner (claim number 1012). All other outstanding responses received have been adjourned to a date to be determined.

- 4. Consumer Claims Trustee's Twenty-Second Omnibus Objection to Proofs of Claim (Insufficient Documentation and Untimely Unsecured Consumer Creditor Claims) **(ECF No. 2320)**

Response Deadline: June 5, 2020 at 4:00 p.m.

Response Filed:

- A. Response of Charles Hinkle to Consumer Claims Trustee's Twenty-Second Omnibus Objection to Proofs of Claim (Insufficient Documentation and Untimely Unsecured Consumer Creditor Claims) **(ECF No. 2605)**

Related Documents:

- B. Notice of Adjournment of Hearing of Consumer Claims Trustee's Twenty-Second Omnibus Objection to Proofs of Claim (Insufficient Documentation and Untimely Unsecured Consumer Creditor Claims) **(ECF No. 2521)**
- C. Order Granting Consumer Claims Trustee's Omnibus Motion to Estimate for Purposes of Distribution Reserve and to Classify Certain Proofs of Claim **(ECF No. 4733)**

- D. Reply of Consumer Claims Trustee in Support of the Consumer Claims Trustee's Twenty-Second Omnibus Objection to Proofs of Claim (Insufficient Documentation and Untimely Unsecured Consumer Creditor Claims) Solely as to the Claim of Charles Hinkle (Claim No. 2191) **(ECF No. 4995)**
- E. Notice of Hearing of Consumer Claims Trustee in Support of the Consumer Claims Trustee's Twenty-Second Omnibus Objection to Proofs of Claim (Insufficient Documentation and Untimely Unsecured Consumer Creditor Claims) Solely as to Claim No. 2191 **(ECF No. 4996)**

Status: This matter is going forward on a contested basis solely with respect to the claim of Charles Hinkle (claim number 2191). All other outstanding responses received have been adjourned to a date to be determined.

IV. RESOLVED MATTERS:

- 5. Consumer Claims Trustee's Thirtieth Omnibus Objection to Proofs of Claim (Insufficient Documentation Unsecured Consumer Creditor Claims) **(ECF No. 2836)**

Response Deadline: October 16, 2020 at 4:00 p.m.

Responses Filed:

- A. Response of Timothy Dugdale to Consumer Claims Trustee's Thirtieth Omnibus Objection to Proofs of Claim (Insufficient Documentation Unsecured Consumer Creditor Claims) **(ECF No. 3525)**
- B. Addendum to Response to Opposition to Proof of Claim **(ECF No. 3612)**
- C. Supplemental Statement of Timothy Dugdale **(ECF No. 4948)**
- D. Judicial Notice #1 of Timothy Dugdale **(ECF No. 4954)**
- E. Amended Complaint and Response to Trustee's Reply in Support of Thirteenth Omnibus Objection to Proof of Claim (Insufficient Documentation) **(ECF No. 4955)**
- F. Judicial Notice #2 of Timothy Dugdale **(ECF No. 4977)**
- G. Judicial Notice #3 of Timothy Dugdale **(ECF No. 4978)**
- H. Exhibits E – G of Timothy Dugdale **(ECF No. 4979)**

Related Documents:

- I. Notice of Adjournment of Consumer Claims Trustee's Thirtieth Omnibus Objection to Proofs of Claim (Insufficient Documentation Unsecured Consumer Creditor Claims) **(ECF No. 2913)**
- J. Order Granting Consumer Claims Trustee's Omnibus Motion to Estimate for Purposes of Distribution Reserve and to Classify Certain Proofs of Claim **(ECF No. 4733)**
- K. Joint Reply of Plan Administrator and Consumer Claims Trustee in Support of Omnibus Objection with Respect to Claim of Timothy Dugdale (Claim No. 2876) **(ECF No. 4938)**
- L. Notice of Hearing of Consumer Claims Trustee's Thirtieth Omnibus Objection to Proofs of Claim (Insufficient Documentation Unsecured Consumer Creditor Claims) **(ECF No. 4939)**
- M. Notice of Adjournment of Hearing of Consumer Claims Trustee's Thirtieth Omnibus Objection to Proofs of Claim (Insufficient Documentation Unsecured Consumer Creditor Claims) Solely as to Claim No. 2876 **(ECF No. 4957)**
- N. Notice of Hearing of Consumer Claims Trustee's Thirtieth Omnibus Objection to Proofs of Claim (Insufficient Documentation Unsecured Consumer Creditor Claims) Solely as to Claim No. 2876 **(ECF No. 4963)**
- O. Minutes of Proceedings **(ECF No. 4989)**
- P. Second Amended Claim (Complaint) of Timothy Dugdale **(ECF No. 4990)**
- Q. Notice of Presentment of Stipulation Resolving Proof of Claim of Timothy Dugdale (Claim No. 2876) **(ECF No. 4997)**
- R. Certificate of No Objection to Stipulation Resolving Proof of Claim of Timothy Dugdale (Claim No. 2876) **(ECF No. 5002)**
- S. Stipulation Resolving Proof of Claim No. 2876 **(ECF No. 5003)**

Status: This matter has been resolved.

6. Motion of Timothy Dugdale to File Amended Claim **(ECF No. 4990)**

Response Deadline: February 12, 2025 at 2:00 p.m.

Responses Filed: None.

Related Documents:

- A. Notice of Presentment of Stipulation Resolving Proof of Claim of Timothy Dugdale (Claim No. 2876) **(ECF No. 4997)**
- B. Certificate of No Objection to Stipulation Resolving Proof of Claim of Timothy Dugdale (Claim No. 2876) **(ECF No. 5002)**
- C. Stipulation Resolving Proof of Claim No. 2876 **(ECF No. 5003)**

Status: This matter has been resolved.

V. ADJOURNED MATTER:

- 7. Motion of Counsel for Certain Consumer Creditors Pursuant to Sections 503(b)(3) and (b)(4) of the Bankruptcy Code for Allowance of Payment of Expenses Incurred **(ECF No. 1579)**

Response Deadline: October 16, 2020 at 4:00 p.m.

Response Filed:

- A. Plan Administrator's Objection to Motion of Consumer Creditor Counsel for Allowance of Payment of Fees and Expenses Incurred as Administrative Expense Claim **(ECF No. 3668)**

Related Documents:

- B. Declaration of Thomas D. Domonoske in Support of Application for Fees **(ECF No. 1580)**
- C. Declaration of O. Max Gardner, III **(ECF No. 1581)**
- D. Declaration of Theodore O. Bartholow, III in Support of Application for Administrative Claim Attorney's Fees Based on Substantial Contribution to Debtors' Bankruptcy Case **(ECF No. 1582)**
- E. Response of Counsel for Certain Consumer Creditors to Plan Administrator's Objection to Motion Pursuant to Section 503(b)(3)(d) and (b)(4) of the Bankruptcy Code for Allowance of Payment of Fees and Expenses Incurred **(ECF No. 3717)**

- F. Reply of the Plan Administrator to the Response of Counsel for Certain Consumer Creditors to Plan Administrator's Objection to Motion Pursuant to Sections 503(b)(3)(d) and (b)(4) of the Bankruptcy Code for Allowance of Payment of Fees and Expenses Incurred (**ECF No. 3885**)

Status: This matter has been adjourned to March 28, 2024.

Dated: February 28, 2024
New York, New York

/s/ Richard W. Slack
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